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November 14, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, D.C. 20002

FILED/ACCEPTED

NOV 14 2007

Federal Communications Commission
Office of the Secretary

RE: Answers to Request for Admissions, US Bell, Inc.; EB Docket No. 07-197

Dear Madame Secretary:

Enclosed for filing on behalf of parties Kurtis J. Kintzel, Keanan Kintzel, and all other Entities by which they do business before the Federal Communications Commission, is the original and 6 copies of the Answers to the Enforcement Bureau's Request for Admission of Facts and Genuineness of Documents to US Bell, Inc., in the above-referenced matter.

Sincerely,

Catherine Park, Esq.

Catherine Park, Esq.

Enclosures: Original + 6 Copies

No. of Copies rec'd 0 + 6
List ABCDE

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Kurtis J. Kintzel, Keanan Kintzel, and all)	EB Docket No. 07-197
Entities by which they do business before the)	
Federal Communications Commission)	
)	
Resellers of Telecommunications Services)	
)	
To: Presiding Officer, Richard L. Sippel)	
(Chief ALJ))	

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Federal Communications Commission
Office of the Secretary

**ANSWERS TO ENFORCEMENT BUREAU'S REQUEST FOR ADMISSION OF FACTS
AND GENUINENESS OF DOCUMENTS TO U.S. BELL, INC.**

The party, by his undersigned counsel, hereby answers the Request for Admissions and Genuineness of Documents propounded by the Enforcement Bureau as follows:

- a. The information supplied in these Answers is true to the best of the party's knowledge, information, and belief;
- b. The word usage and sentence structure may be those of the attorney who in fact prepared these Answers and does not purport to be that of the executing party; and
- c. Discovery is not complete; the party reserves the right to supplement its Answers if additional information comes to its attention.

Answers

1. “US Bell is bound by a consent decree between the Commission and BOI dated on or about February 13, 2004 (the “Consent Decree”) in connection with a proceeding under EB Docket No. 03-85.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the question because it is purportedly directed to “US Bell,” but the definition of “US Bell” provided by the Enforcement Bureau encompasses companies and entities clearly outside the reasonable range of a question purportedly directed to US Bell, Inc. By providing such an unreasonably broad definition of “US Bell,” the Enforcement Bureau seems to assume that it is entitled to pierce the corporate veil without pleading and proving the same. The Enforcement Bureau defines “US Bell” as “US Bell, Inc., any affiliate, d/b/a, predecessor-in-interest, parent company, wholly or partially owned subsidiary, successor-in-interest or other affiliated company or business, including but not limited to, BOI, Avatar and Buzz, and all directors, officers, employees, shareholders or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period February 11, 2004 through the present, unless otherwise noted.” The Order to Show Cause, FCC 07-165, does not allege specific facts that would justify corporate veil-piercing under existing law, and does not even allege that it is seeking to establish that US Bell, Inc., is a sham corporate entity. Thus the inclusion of US Bell, Inc.’s affiliates, parent companies, subsidiaries, etc., in the definition of “US Bell” is improper.

2. “US Bell was an affiliate of BOI during the period February 11, 2004 through the present.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved

as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

3. “US Bell was an affiliate of Buzz during the period February 11, 2004 through the present.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

4. “US Bell was an affiliate of Avatar during the period February 11, 2004 through the present.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

5. “Avatar, BOI, Buzz and US Bell have been affiliates during the period February 11, 2004 through the present.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

6. “US Bell has not made all monthly payments toward the voluntary contribution due under the terms of the Consent Decree.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

7. “The Companies have not made all monthly payments toward the voluntary contribution due under the terms of the Consent Decree.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

8. “US Bell failed to make the payment toward the \$510,000 voluntary contribution that was due in June 2005.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

9. “The Companies failed to make the payment toward the \$510,000 voluntary contribution that was due in June 2005.”

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of “US Bell” provided by the Enforcement Bureau, as stated in the Answer to question 1.

10. "US Bell failed to make the payments toward the \$510,000 voluntary contribution that were due in each of August 2005 through April 2006."

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of "US Bell" provided by the Enforcement Bureau, as stated in the Answer to question 1.

11. "The Companies failed to make the payments toward the \$510,000 voluntary contribution that were due in each of August 2005 through April 2006."

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of "US Bell" provided by the Enforcement Bureau, as stated in the Answer to question 1.

12. "US Bell has made no payments toward the \$510,000 voluntary contribution since its May 2006 installment payment."

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of "US Bell" provided by the Enforcement Bureau, as stated in the Answer to question 1.

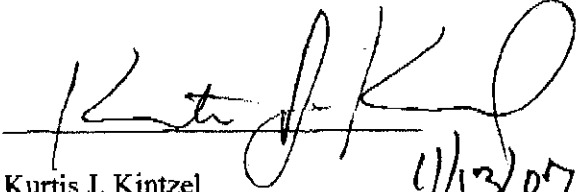
13. "The Companies have made no payments toward the \$510,000 voluntary contribution since the May 2006 installment payment."

Answer: US Bell, Inc. (Link Technologies, Corp.) is closed as a business and dissolved as a corporate entity. The Enforcement Bureau has requested US Bell to respond, but US Bell no longer exists and therefore cannot respond. The party also objects to the definition of "US Bell"

provided by the Enforcement Bureau, as stated in the Answer to question 1.

SWORN STATEMENT

I hereby declare under penalty of perjury that the information supplied in the foregoing Answers is true to the best of my knowledge, information, and belief. The word choice and sentence structure may be those of the attorney and does not purport to be that of the executing parties. Discovery is not complete; the parties reserve the right to supplement their Answers if additional information comes to their attention.


Kurtis J. Kintzel 11/13/07


Catherine Park 11/13/07

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